

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

ALEXANDER STYLLER, INTEGRATED
COMMUNICATIONS & TECHNOLOGIES,
INC., JADE CHENG, JASON YUYI, CATHY
YU, CAROLINE MARAFEO CHENG,
PUSHUN CHENG, CHANGZHEN NI,
JUNFANG YU, MEIXIANG CHENG,
FANGSHOU YU, and CHANGHUA NI,

Plaintiffs,

vs.

HEWLETT-PACKARD FINANCIAL
SERVICES COMPANY, HEWLETT-
PACKARD FINANCIAL SERVICES (INDIA)
PRIVATE LIMITED, HP INC., HEWLETT
PACKARD ENTERPRISE COMPANY, and
DAVID GILL

Defendants.

Civil Action No. 1:16-CV-10386 (LTS)

**DEFENDANTS' ASSENTED-TO MOTION TO IMPOUND EXHIBITS TO
DECLARATION OF PAUL A. SASO**

Defendants Hewlett-Packard Financial Services Company, Hewlett-Packard Financial Services (India) Private Limited, HP Inc., Hewlett-Packard Enterprise Company, and David Gill (collectively, "Defendants") hereby move, pursuant to Local Rule 7.2, that the Court impound the exhibits attached to the Declaration of Paul A. Saso ("Saso Declaration") ([Dkt. No. 354](#)), concerning Defendants' Reply Memorandum of Law in Further Support of Their Motion for Spoliation Sanctions ("Reply Memorandum") ([Dkt. No. 355](#)), until further order of the Court. Grounds for this motion are as follows:

1. It is necessary for Defendants to attach several exhibits to the Saso Declaration accompanying Defendants' Reply Memorandum. These exhibits are documents designated by

Plaintiffs as “CONFIDENTIAL” under the Joint Stipulated Protective Order (“Protective Order”) entered in this case ([Dkt. No. 186](#)).

2. The Protective Order mandates that all materials designated as “CONFIDENTIAL” shall be filed under seal. [Dkt. No. 186](#), ¶ 9.

3. Defendants’ counsel has conferred with Plaintiffs’ counsel regarding this Motion, and Plaintiffs assent to the filing of this Motion.

WHEREFORE, in an effort to comply with their obligations under the Protective Order, Defendants respectfully request that the exhibits to Defendants’ Reply Memorandum be impounded until further order of the Court. Upon termination of the impoundment period, outside counsel for Defendants will retrieve and take custody of the impounded materials.

Dated: New York, New York
May 14, 2020

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By: /s/ Paul A. Saso
Paul A. Saso
(admitted pro hac vice)

CERTIFICATION UNDER LOCAL RULE 7.1(a)(2)

I, Paul A. Saso, counsel for Defendants, certify that on May 14, 2020, I conferred with Dimitry Joffe, counsel for Plaintiffs, concerning the subject of this Motion. We conferred in good faith, and counsel for Plaintiffs assented to the filing of this Motion.

/s/ Paul A. Saso

Paul A. Saso

CERTIFICATE OF SERVICE

I, Christina T. Lau, Attorney for Defendants Hewlett-Packard Financial Services Company, Hewlett-Packard Financial Services (India) Private Limited, HP Inc., Hewlett Packard Enterprise Company, and David Gill, hereby certify that the foregoing document was filed using the CM/ECF system and electronic notice will be sent to registered participants as indicated on the Notice of Electronic Filing (NEF) on May 14, 2020.

/s/ Christina T. Lau

Christina T. Lau